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August 15, 2007

Lane Transit District
Attn: Mr. Gaydos and Mr. Evans
PO Box 7070
Eugene, OR 97401-0470

Dear Mr. Gaydos and Mr. Evans:

Thank you for your letter of July 18, 2007, responding to 3RT's Public Participation Compliance Report of June 29, 2007. We appreciate that you are taking our input seriously. As residents along the proposed route of your next EmX project, we feel we are the people whose lives could be most impacted by the construction and operation of any new bus services, particularly a line like EmX, which, as we now know from seeing the AGreen Line,[@] requires dramatic and expensive change to streets and adjacent infrastructure. We fully expect your commitment to work with us and other residents, not only on the design of the West Eugene EmX corridor, but also on the siting, or routing, of the proposed EmX bus line.

Some of the members of our group read your letter of July 18 as suggesting that you would be willing to listen to us with respect to design features, but not with respect to the *location* of the new line. If that is so, we need to sort these issues out immediately, because our dialogue together can not be complete unless LTD, 3RT and other neighborhood groups, for that matter, are fully aware of what the discussion is about. To us, the conversation is not just about pedestrian and bicycle amenities, for example, but about *where*, and *whether* an EmX line through West Eugene should be built.

As you know, 3RT has been involved in many months of discussion with LTD, and with our elected officials at the Federal and local levels, concerning this project. We organized and became involved, not at the request of LTD or of the City, but because it came to our attention that LTD might have been planning to build an EmX line, not just through West Eugene, but up West 11th avenue from the downtown station. You have heard our input, and, we hope, you have paid attention to it. However, it should be noted that public participation as it relates to the West Eugene Corridor and its adjacent areas was initiated by our neighborhood group: *we contacted you, you did not contact us*. This fact caused us some concern about whether our

Working to assure that bus rapid transit development in Eugene is driven by need, is planned in collaboration with all stakeholders, and does not diminish neighborhood livability, safety and character along bus rapid transit routes.

Mr. Gaydos and Mr. Evans

August 15, 2007

Page 2

participation, as potentially the first old-Eugene neighborhood through which this line might pass, was invited. Even now, the new Eugene Corridor Committee created on March 21 (by your board of directors to include the participation of various stakeholders), has not yet convened. We are beginning to suspect you are less enthusiastic about hearing our opinions than you say you are.

Mr. Gaydos, you will recall that when you were kind enough to meet with us at one of our 3RT meetings with Mr. Schwetz, we voiced our concern that we not "wake up some day" and find an EmX line built in front of our homes. You personally assured us as a group that would not happen. Respectfully, we are going to hold you and LTD to that assurance.

Over the months that we have studied this issue, it occurred to our group that LTD has not made a strong case, or really *any* case, for building another EmX line through the West Eugene Corridor. True, there has been considerable discussion about reducing traffic congestion on the far end of West 11th Avenue, and City Council has independently initiated a study to see what can be done there. However, we have not been made aware of facts or any study which support some of the premises on which LTD seems to base its decision to run an EmX line through West Eugene.

For example, at page 2 of your July 18 letter, you state that "transit service on Highway 99 would not have any significant impact on West 11th transit use." Why do you say that? Has LTD or any other transportation organization conducted a study that would support the spending of tens of millions of tax payer dollars to build a line from, for example, the downtown LTD station to points on West 11th Avenue? Has LTD conducted surveys or studies regarding the purposes of trips that people in automobiles make during times of heavy congestion on West 11th? Has LTD conducted, or been made aware of any empirical studies which would tend to show that motor travelers on Highway 99 are not driving that route already as a means of traveling from points west of Eugene to City Center? We have asked these questions, repeatedly, as concerned citizens. We have not been given answers that would help us understand and, if warranted, support your project. We know we are not the decision-makers here, but we are strong supporters of adherence to State of Oregon Planning Goal #1 for Citizen Involvement (OAR 660-015-0000(1)), with which LTD is obliged to comply.

You were quite correct in your assessment of our concern for the character and livability of existing neighborhoods. In order to preserve those things, EmX routes should conform to another of Oregon's Statewide Planning Goals and Guidelines. Specifically, Goal 12, "*To provide and encourage a safe, convenient, and economic transportation system,*" is supported by six Guidelines. Guideline number four states, "*Major transportation facilities should avoid dividing existing economic farm units and urban social units unless no feasible alternative exists.*" We think the application of this Guideline to EmX in Eugene is obvious — **EmX routes should not divide an existing residential neighborhood unless no feasible alternative exists.** If an EmX route is to be established to West Eugene, it would have several alternatives

for travel between Garfield and Greenhill that would not violate this Guideline. Between downtown and Garfield, however, there appears to be only one such alternative—namely 6th/7th to/from Garfield.

We think that the history of this alternative needs to be reviewed. The initial public input to LTD's West Eugene EmX planning was the Open House/Workshops held around January 18, 2000, at the Lane County Fairgrounds. While the 6th/7th route alternative had not been proposed by LTD, "[a]t the request of west Eugene neighborhood groups, a West 6th/7th Avenues Alternative was added."¹ This alternative was presented to Workshop participants, and evaluated by them along with routes previously proposed by LTD. A determination by LTD that this route is not feasible would need to be supported by convincing data and logic. As one Workshop participant wrote as a follow-up:

"Personally, of the two, I favor the 6th/7th alignment. It is a natural link with additional BRT lines that will obviously be needed for the new growth north out Hwy 99, River Road, and Delta Hwy including Valley River Center. These areas are expanding quickly, this is where, according to the maps, the majority of undeveloped parcels are, and where the greatest concentration of commercial and retail is, plus they are far enough away from downtown to make it worth getting on an express bus."²

Jon Belcher, a current Eugene Planning Commissioner, wrote:

"I encourage LTD to keep the 6th/7th Street alignment option in consideration. I am very concerned that there are problems with obtaining sufficient r/w on 11th and 13th given trees, powerpoles, parking and potential bike lanes. I also have not seen a +/- analysis of 6th/7th. Having both routes on the table could help avoid the situation you had in Glenwood where the alignment kept moving back and forth."³

Since 2000, the growth pattern has accelerated in northern parts of West Eugene, as well as further to the northwest. In the future, public transportation in those areas will need to be enhanced, which probably means additional bus service out Hwy 99. An EmX route to West Eugene that traveled 6th/7th at least as far as Garfield could interact with a route out Hwy 99, perhaps near the "Big Y" intersection east of the Hwy 99 bridge to Four Corners (Hwy 99 and Roosevelt).

1 Lane Transit District East-West Pilot Corridor Study: West Eugene General Alignment Community Involvement Summary, January, 2000, page 2.

2 *Ibid.*, at Appendix E, tenth unnumbered page.

3 *Ibid.*, at Appendix E, second unnumbered page.

Mr. Gaydos and Mr. Evans

August 15, 2007

Page 4

We named our group Residents for Responsible Rapid Transit (3RT for short) because we are people who support public transportation, be that via enhanced bus service, modern light rail or urban streetcar or trolley systems. We are neighbors who, for the most part, live in stately older homes on West 11th Avenue and on adjacent streets, from West 8th Avenue to West 18th Avenue, and we are business people, engaged community citizens and taxpayers. We are people who are concerned about the environment and people who are concerned about reducing traffic and who can easily imagine a future when personal automobile travel will be too financially and environmentally expensive for most people. However, we are also people who believe that decisions of the magnitude of EmX need to be made only after an extensive cost/benefit analysis has been completed. Again, although we feel we have asked the right questions of LTD as we have worked together, we are not satisfied with the answers that have been given on these issues.

On the issue of the City Council, I think you know that we are actively engaged in conversations with the Mayor and the City Councilors. We have questioned the true intent of the City Council in voting to spend City funds to study transportation in West Eugene, as that was discussed and voted upon in the October 9, 2006 work session of City Council. From what we can tell, following our considerable discussions with council members and others, the vote at that October 9th meeting was not intended by the Council to be either a directive to finance a study confined to "West 11th Avenue", nor was it intended as a green light for LTD to build its next EmX corridor through West Eugene without giving true consideration to alternatives, even to the alternative of not building the route.

You say in your letter that you were required to "consider a broad range of alternatives at the outset" of your process, (where are you in that process at this moment?) and that you are going to consider 6th and 7th Avenues as options. We think that is the only reasonable way to proceed. We agree that it is part of your mandate to fully and impartially consider the reasonable options, and, as a group, we are going to hold you to that requirement to the best of our ability.

We at 3RT are well aware that LTD bears the burden of showing that it has engaged in a full and fair process of considering all alternatives and in evaluating the impact upon the environment (that is, upon the persons, property and quality of life which comprise the Aurban social units, @ i.e., our neighborhoods) along the routes being considered. This will be required when LTD submits its formal plan for whatever route is chosen. We consider it part of our mission as 3RT to see to it that LTD engages not only in the process itself, but that it engage in a *meaningful* process *before* these decisions are made final. We look forward to continuing constructive dialogue as we offer our input for your consideration. We also are chronicling these discussions as we continue to raise points that we think are important for our community and to the decision-making of LTD and of our city government.

Next, we want to respond to your question concerning the term “commuter” as applied to EmX riders traveling regularly for certain purposes other than morning and evening trips to work and back. Our use of the term “commuter” was intended to apply to people making periodic travel to/from the same destination, or for the same purpose. In its narrowest sense, “commuter” has been applied to workers traveling to/from their place of employment. In common usage the term has been applied more broadly, as web searches on terms such as “commute to school” or “commute to shop” demonstrate. Our use of the term “commuter” to apply to this type of bus rider was also meant to reflect certain characteristics of ridership that have been reported. A recent survey of Sun Tran riders in Tucson, AZ, for example, reported that 77% of riders rode the bus between 4 and 7 times per week, and that riders to school, doctor appointments, shopping, and recreation, together outnumbered riders going to work.⁴ Furthermore, Martin Wachs, Head of the Urban Planning Program at the School of Architecture and Urban Planning at UCLA, states, “During the next twenty years, however, it is expected that non-work and non-school trips will grow at a rate three times the rate of growth in work and school trips.”⁵

Finally, you pointed out in your letter that you disagree with our reference to EmX as a “high speed” system. We want to point out that this was not our characterization. This terminology comes from the original federal study upon which we understand the EmX, or Bus Rapid Transit project, as it was formerly known, is based.⁶ The term “high speed” also is regularly used by other jurisdictions that are building BRT systems, and by national transit organizations which advocate for BRT systems.⁷ We understand that LTD does not want people to view the EmX vehicle as a large bus that speeds down the crowded streets of Eugene within inches of pedestrians and other traffic. But, from our point of view, your project seems to place great emphasis on saving time and distance from point from A to B. (We note in passing that some of the members of 3RT participated in the discussions that you sponsored at the Lane County Fair Grounds in the year 2000 where your engineers emphasized, almost to the exclusion

4 Sun Tran Rapid Transit Project, Appendix B Survey Findings, on 7/30/77 from <http://www.cabq.gov/transit/pdf/10-AppendixB.pdf>

5 The Case for Bus Rapid Transit in Los Angeles, Martin Wachs, on 7/30/07 from <http://www-rcf.usc.edu/~pgordon/transit5.html>

6 *See*, Federal Transit Administration (FTA), Characteristics of Bus Rapid Transit for Decision-Making, Project No. FTA-VA-26-7222-2004.1 (Aug 2004) (discussion high-speed characteristic of BRT in Elements and Running Time, Running Time Reliability and Safety).

7 *See, e.g.*, City of Edmonton (Canada) High Speed Transit Planning Study – Final Report (Aug 2004) (analysis of BRT as a high-speed transit mode); National Bus Rapid Transit Institute (NBRTI) Bus Rapid Transit - Planning Guide 2007.

Mr. Gaydos and Mr. Evans
August 15, 2007
Page 6

of other features of the system, how much time the new buses would save in transit from the downtown LTD station to the Seneca Station, near Fred Meyer, on West 11th Avenue.)

You have told us that a new EmX line, whether it goes up West 11th or West 13th or West 8th, or any of the other streets in our neighborhood, will have limited stops, and that it will eliminate or replace existing service. Yet another serious impact on our neighborhood, then, would be reduced service to the public who wish to board the bus in our neighborhood. While it sounds to us like this describes an express bus, you are the experts, and you can name your lines and the components thereof as you wish. We suggest, though, that it would be useful for everyone to get on the same page with respect to terminology. Toward that end, we would encourage LTD to publish a glossary of terms so that this continuing dialogue will not be muddled by confusion as to what we are each talking about.

We look forward to continued meaningful participation in these discussions.

Sincerely,

Anthony T. Rosta Charles Snyder

For 3RT

cc: Recipients of 3RT's Public Participation Compliance Report (June 29, 2007), and LTD's responding letter (July 18, 2007)
Bill Morrisette